<u>REMARKS</u>

Claims 1-55 are pending, with claims 1, 24, 34, and 35 being independent.

Claims 1-10, 14-44, 54 and 55 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Sonnenreich (U.S. 5,974,446).

Claims 11-13, which depend from independent claim 1, stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sonnenreich.

Claims 45-53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sonnenreich in view of Simonoff. (U.S. 5,974,446).

This response first addresses the rejection with respect to claims 1-10, 14-33, 35-44, 54, and 55. Second, this response addresses the rejection of claim 34. Finally, this response addresses the rejection of claims 11-13 and claims 45-53.

<u>Claim 1-10, 14-33, 35-44, 54, and 55</u>

With respect to independent claims 1, 24 and 35 and their respective dependent claims, Applicants respectfully traverse this rejection.

Claim 1 recites a computer-implemented method of sharing information among members of a group that includes storing information about more than one current member of a group in a database, and receiving instructions from at least one current member to invite at least one prospective member to join the group. Responsive to the current member's instructions, <u>an invitation is sent</u> to the prospective member to join the group, and a response is received from the prospective member. <u>Based upon receipt of an affirmative response to the invitation that was inspired by a current member's instruction, the prospective member is added</u> to the group as a new member and services to current members are automatically updated to account for the new member.

Applicants respectfully request reconsideration and withdrawal of the rejection because Sonnenreich fails to describe or suggest sending, at the direction of a current member, an invitation to a prospective member to join the group, and adding the prospective member to the group as a new member based upon receipt of an affirmative response to the invitation. Rather, Sonnenreich describes adding members to groups based on their attributes or shared common

interests, without disclosure or suggestion of current member directed invitations to inspire membership by prospective members.

More particularly, Sonnenreich fails to describe or suggest sending an invitation to a prospective member to join the group and adding the prospective member to the group as a new member based upon receipt of an affirmative response to the invitation, as recited in claim 1.

The office action accurately characterizes Sonnenreich as disclosing "the teachings of groups of people with common interests". The office action also accurately points out that Sonnenreich users, upon logging in, "will see a toolbar containing a button for each group they belong to".

However, the office action attempts to establish that an invitation is inherent for a member to join a group by relying upon Sonnenreich's disclosure of a "private group", stating that "in order for people to join a private group, they must be invited". Applicants respectfully disagrees with each of these prepositions.

Sonnenreich teaches two processes for grouping users: (1) based on topic areas selected by the user, and (2) based on relationship of the user to other users. The first process involves monitoring user selection of topic area at initial login or thereafter, and grouping of users who have chosen common topics of interests. See, e.g., Sonnenreich, Col. 8, lines 20-38. Specifically, at Col. 8, lines 20-37, Sonnenreich discloses:

> "If a first time user, a new-user profile screen is provided for establishing identity, user name(email), password, location and selected informational topics of interest, ... the main interface screen F comes up containing a menu bar and a selection of "buttons" representing the user selected topics of interest...."

In this manner, a new user is automatically included in a group of the specific topic interest, eliminating the need for an invitation, the description of which is therefore understandable omitted by Sonnenreich.

The second of these processes for grouping users involves establishing a "private" group for each user. Sonnenreich clearly describes the membership of these private groups at Col. 3, lines 55-56, indicating that "[a]ll users are members of their own private 'group' which contains a list of people they know on the system". While Sonnenreich suggests that a user may organize the user's own private group into subsets (for example, based on interest and hobbies), these groups are, by definition, "private" to the user, as disclosed by Sonnenreich.

Sonnenreich fails to disclose or suggest any process, or motivation, for enabling or requiring a user to send an invitation to join their private group, or to require prospective members an affirmative response from the prospective member to add the prospective member to their private group. Rather, Sonnenreich explains that the membership of a user's private group is limited only by who that user knows. *See*, Sonnenreich, Col. 3, lines 54-56, "All users are members of their own private 'group' which contains a list of the people they know on the system.". In fact, the notion of privacy would seem to preclude such invitation. Therefore, a "private group" does not imply that an invitation is needed for a new member to join in.

Moreover, with respect to claim 1, Sonnenreich does not describe or suggest adding a prospective member to the group in response to affirmative response to an invitation from the prospective member.

Similar to claim 1, in independent claim 24 and 35, the prospective member is added to the group as a new member based upon receipt of an affirmative response.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of independent claims 1, 24 and 35 and their respective dependent claims, namely claims 2-10, 14-33, 36-44, 54 and 55.

Claim 34

Claim 34 recites a graphical user interface for inviting a prospective member of a group to join the group. The graphical user interface includes an invitation for the prospective member to join the group, a name of the group, a list of one or more current members of the group, and a tool for the prospective member to respond to the invitation. Applicants respectfully request reconsideration and withdrawal of the rejection because Sonnenreich fails to describe or suggest providing a graphical user interface to a prospective member that includes a name of a group, a list of the members of the group, and a tool for the prospective member to join the group prior to being a current member of the group.

Sonnenreich does not describe or suggest any user interface for a member who is not part of the system (i.e., a prospective member) that includes an invitation to join the group, a name of the group and a list of one or more current members of the group.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 34

Claims 11-13

With respect to claims 11-13, Applicants respectfully request reconsideration and withdrawal of the rejection because Sonnenreich fail to describe or suggest the features discussed above with respect to independent claim 1 upon which claims 11-13 depend. As noted above, Sonnenreich fails to describe or suggest sending an invitation to a prospective member to join the group and adding the prospective member to the group as a new member based upon receipt of an affirmative response, as recited in claim 1.

For at least these reasons, Applicants respectfully request withdrawal of the rejection § 103(a) of claims 11, 12 and 13.

Claims 45-53

With respect to claims 45-53, Applicants respectfully request reconsideration and withdrawal of the rejection because Sonnenreich and Simonoff, either alone or in combination, fail to describe or suggest the features discussed above with respect to independent claim 1 upon which claims 45-53 depend.

For at least these reasons, Applicants respectfully request withdrawal of the § 103(a) rejection of claims 45-53.

Information Disclosure Statement

Upon reviewing the file, Applicants noted that they have not received an initialed copy of the enclosed PTO Form 1449 that accompanied an information disclosure statement filed January 24, 2002. Applicants' records show that this information disclosure statement complied with 37 CFR 1.97. Thus, we respectfully request that the examiner initial and return this form (courtesy copy enclosed) as soon as possible.

Enclosed is a check for $620 check of which $120 is for the Petition for Extension of Time fee and $500 is for the concurrently filed Notice of Appeal. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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